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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JENNIE QUAN, individually and as
successor in interest to BENJAMIN
CHIN, deceased,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES;
MARISOL BARAJAS; HECTOR
VAZQUEZ; and DOES 3-10, inclusive,

Defendants.

Case No. 2:24-cv-04805-MCS-KS

Assigned to:

Hon Mark C. Scarsi
Hon. Mag. Judge Karen L. Stevenson

**DECLARATION OF HANG D. LE IN
SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS'
MOTIONS IN LIMINE NO. 1**

Final Pretrial Conference:

Date: January 26, 2026

Time: 2:00 p.m.

Crtrm: 7C

Trial:

Date: February 10, 2026

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I, Hang D. Le, hereby declare as follows:

1. I am an attorney duly licensed to practice law in the United States District Court for the Central District of California. I make this Declaration in Support of Plaintiff’s Opposition to Defendants’ Motion in Limine No. 1. I have personally familiar with the matters stated herein and could testify competently thereto if called.
2. Attached hereto as “**Exhibit A**” is a true and correct copy of the Rule 26 Report of Plaintiff’s expert, Bennet Omalu, MD.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct. Executed this 12th day of January 2026, in Los Angeles, California.

